

Mr. Victor Shields
Industrial Coating Services, Inc. - Lexington Avenue Plant
5345 East Lexington Avenue
Indianapolis, IN 46219

Re: Registered Operation Status,
097-18185-00513

Dear Mr. Shields:

The application from Industrial Coating Services, Inc. - Lexington Avenue Plant, received on February 16, 1999, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-5.5, it has been determined that the following industrial coating plant for small metal auto parts manufacturing, located at 5345 East Lexington Avenue, Indianapolis, Indiana 46219, is classified as registered:

- (a) One (1) electro-deposition application process, constructed in 1989, using Ransburg automatic spray application system, with dry filters for particulate control, exhausting to stack IDs 22 and 23;
- (b) One (1) electro-deposition application process, constructed in 1992, using manual electrostatic air atomized touchup booth, with dry filters for particulate control, exhausting to stack IDs 12, 13 and 14;
- (c) One (1) natural gas-fired electro-deposition curing oven, constructed in 1989, rated at 2.5 million (MM)Btu per hour, exhausting to stack IDs 17 and 19;
- (d) Natural gas-fired space and process heaters with a combined heat input capacity of 2.57 million (MM)Btu per hour and exhausting to stack IDs 1, 2, 3, 4 and 5; and
- (e) Pre-treatment process using water based alkaline solutions for cleaning and surface preparation of small metal parts.

The following conditions shall be applicable:

- (a) Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
 - (1) Opacity shall not exceed an average of thirty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

- (b) Pursuant to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes), particulate from the automatic spray booth and the manual touchup booth shall be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

- (c) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the automatic spray booth shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

- (d) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating), any change or modification which would increase the actual VOC emissions to fifteen (15) pounds per day or more from the manual touchup booth shall obtain prior approval from IDEM, OAQ.

An authorized individual shall provide an annual notice to the Office of Air Quality and Office of Environmental Services (OES) that the source is in operation and in compliance with this registration pursuant to 326 IAC 2-5.5-4(a)(3)). The annual notice shall be submitted to:

**Compliance Data Section
Office of Air Quality
100 North Senate Avenue
P.O. Box 6015
Indianapolis, IN 46206-6015**

and

**Office of Environmental Services
Air Quality Management Services
Compliance Data Group**

2700 Belmont Avenue, Indianapolis, Indiana 46221-2097

no later than March 1 of each year, with the annual notice being submitted in the format attached.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) and Office of Environmental Services (OES) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Originally Signed by

John B. Chavez
Administrator

AB/EVP

cc: File - OES
Air Permits - Mindy Hahn

Registration

This form should be used to comply with the notification requirements under 326 IAC 2-5.5-4(a)(3)

Company Name:	Industrial Coating Services, Inc. - Lexington Avenue Plant
Address:	5345 East Lexington Avenue
City:	Indianapolis
Authorized individual:	Victor Shields, E.H&S Manager
Phone #:	(317) 322-7450
Registration #:	097-18185-00513

I hereby certify that Industrial Coating Services, Inc. - Lexington Avenue Plant is still in operation and is in compliance with the requirements of Registration 097-18185-00513.

Name (typed):
Title:
Signature:
Date:

**Indiana Department of Environmental Management
Office of Air Quality
and
City of Indianapolis
Office of Environmental Services**

Technical Support Document (TSD) for a Registration

Source Background and Description

Source Name:	Industrial Coating Services, Inc. - Lexington Avenue Plant
Source Location:	5345 East Lexington Avenue, Indianapolis, IN 46219
County:	Marion
SIC Code:	3999
Operation Permit No.:	097-18185-00513
Permit Reviewer:	Alic Bent/EVP

The Office of Air Quality (OAQ) and the Office of Environmental Services (OES) have reviewed an application from Industrial Coating Services, Inc. - Lexington Avenue Plant relating to the operation of a stationary industrial coating plant for small metal auto parts manufacturing.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) electro-deposition application process, constructed in 1989, using Ransburg automatic spray application system, with dry filters for particulate control, exhausting to stack IDs 22 and 23;
- (b) One (1) electro-deposition application process, constructed in 1992, using manual electrostatic air atomized touchup booth, with dry filters for particulate control, exhausting to stack IDs 12, 13 and 14;
- (c) One (1) natural gas-fired electro-deposition curing oven, constructed in 1989, rated at 2.5 million (MM)Btu per hour, exhausting to stack IDs 17 and 19;
- (d) Natural gas-fired space and process heaters with a combined heat input capacity of 2.57 million (MM)Btu per hour and exhausting to stack IDs 1, 2 ,3 , 4 and 5; and
- (e) Pre-treatment process using water based alkaline solutions for cleaning and surface preparation of small metal parts.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) Operating Permit 097-5271-00513, issued November 27, 1991

All conditions from previous approvals were incorporated into this permit.

Enforcement Issue

Any existing source that did not have a valid air registration on November 25, 1998, were required to apply for approval under this rule no later than twelve (12) months from the effective date of this rule. Industrial Coatings Services applied for a permit on February 22, 1999, which was within the twelve (12) month timeframe required by the rule. Therefore, there are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on February 22, 1999.

Emission Calculations

See Appendix A: pages 1 through 6 of this document for detailed emissions calculations.

Uncontrolled Potential Emissions

The table reflects the unrestricted potential to emit.

Pollutant	Potential To Emit (tons/year)
PM	16.69
PM-10	16.89
SO ₂	0.00
VOC	17.57
CO	1.80
NO _x	2.20

HAPs	Potential To Emit (tons/year)
Single HAP	negl.
Total HAPs	negl.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants are less than 100 tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of criteria pollutants is less than 25 tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-6.1.

- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM, PM₁₀ and VOC are greater than levels listed in 326 IAC 2-1.1-3(d)(1), therefore the source is subject to the provisions of 326 IAC 2-5.5.1. A registration will be issued.
- (d) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year, therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (e) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	unclassifiable
SO ₂	maintenance, attainment
NO ₂	attainment
Ozone	maintenance, attainment
CO	attainment
Lead	unclassifiable

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Marion County has been classified as attainment or unclassifiable for PM₁₀, SO₂, NO₂, ozone, CO, and Pb. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) Fugitive Emissions
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	1.67
PM ₁₀	1.87
SO ₂	0.00

VOC	17.57
CO	1.80
NO _x	2.20

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.
- (b) These emissions were based on the information provided in the source's permit applications (see Appendix A for emission calculations).

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, with total emissions as indicated in this permit R-097-18185-00513, is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

This status is based on the revised PTE calculations (see Appendix A).

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

Since this source was constructed in 1989 and had a potential to emit air pollutants that were less than 250 tons per year, it was an existing minor source under PSD. It is not in 1 of 28 listed source categories. There has been no modification to the source since its construction, therefore, the source remains a minor source. Therefore, the source is not subject to the provisions of 326 IAC 2-2.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The source emits less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1-1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it is located in Marion County, a specifically regulated county, and has the potential to emit more than ten (10) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability

326 IAC 6-1-1 (Particulate Limitations - Marion County)

This rule applies to specifically listed sources or facilities, or sources or facilities not specifically listed but located in a listed county and having either a potential to emit of 100 tons per year (tpy) or more actual emissions of 10 tpy or more of PM.

The source is located in Marion County, a specifically listed county. The source and its facilities are not specifically listed at 326 IAC 6-1-12 and, therefore, the requirements of 326 IAC 6-1-12 do not apply. The PTE of PM for the source is less than 100 tpy and the actual source PTE of PM is less than 10 tpy. Therefore, the requirements of 326 IAC 6-1 do not apply.

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)

Particulate from the automatic spray booth and the manual touchup booth shall be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

326 IAC 8-1-6 (New Facilities - General Reduction Requirement)

The source is not subject to this rule. This rule applies to all facilities constructed after January 1, 1980, which have potential VOC emission rates of 25 or more tons per year, and which are not otherwise regulated by other provisions of 326 IAC 8. The automatic spray booth, manual touchup booth and curing oven were all constructed after January 1, 1980, but the potential VOC emissions from each unit are less than twenty-five (25) tons per year. Therefore, 326 IAC 8-1-6 does not apply.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

The automatic spray booth was constructed in 1989, and is located in Marion county, a specifically listed county in 326 IAC 8-2-1(a)(1), with actual VOC emissions of greater than 15 lbs per day before add-on controls. Therefore, 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) apply to this facility. Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the automatic spray booth shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made, automatic spray booth is in compliance with this requirement.

The manual touchup booth was constructed after July 1990, but 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) does not apply to this facility because it has actual VOC of less than 15 lbs per day before add-on controls. Any change or modification which would increase the actual VOC emissions to fifteen (15) pounds per day or more from the manual touchup booth shall obtain prior approval from IDEM, OAQ.

Conclusion

The operation of this industrial coating plant for small metal auto parts manufacturing shall be subject to the conditions of the attached Registration 097-18185-00513.

**Appendix A: Emissions Calculations
VOC and Particulate
From Electro-Deposition Coating**

Page 1 of 6 TSD App A

Company Name: Industrial Coating Services, Inc.
Address City IN Zip: 5345 E. Lexington Avenue, Indianapolis, IN 46219
Plt ID: M 097-18185-00513
Reviewer: Alic Bent/EVP
Date: 2-Oct-03

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Automatic Spray Coating	10.0	61.30%	58.0%	3.3%	89.0%	38.70%	9.32862	1.000	3.01	0.33	3.09	74.18	13.54	15.88	0.86	90%
Manual Touchup	10.0	61.30%	58.0%	3.3%	89.0%	38.70%	0.19038	1.000	3.01	0.33	0.06	1.51	0.28	0.81	0.86	75%

State Potential Emissions	Add worst case coating to all solvents	3.15	75.69	13.81	16.69
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METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emissions Calculations**Natural Gas Combustion Only****MM BTU/HR <100****Space and Process Heaters****Company Name: Industrial Coating Services, Inc.****Address City IN Zip: 5345 E. Lexington Avenue, Indianapolis, IN 46219****Plt ID: M 097-18185-00513****Reviewer: Alic Bent/EVP****Date: 2-Oct-03**Heat Input Capacity
MMBtu/hrPotential Throughput
MMCF/yr

2.6

22.5

Pollutant						
Emission Factor in lb/MMCF	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.0	0.1	0.0	1.1	0.1	0.9

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 2 for HAPs emissions calculations.

Appendix A: Emissions Calculations**Natural Gas Combustion Only****MM BTU/HR <100****Space and Process Heaters****HAPs Emissions****Company Name: Industrial Coating Services, Inc.****Address City IN Zip: 5345 E. Lexington Avenue, Indianapolis, IN 46219****Plt ID: M 097-18185-00513****Reviewer: Alic Bent/EVP****Date: 2-Oct-03****HAPs - Organics**

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	2.364E-05	1.351E-05	8.442E-04	2.026E-02	3.827E-05

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	5.628E-06	1.238E-05	1.576E-05	4.278E-06	2.364E-05

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations**Natural Gas Combustion Only****MM BTU/HR <100****Curing Oven****Company Name: Industrial Coating Services, Inc.****Address City IN Zip: 5345 E. Lexington Avenue, Indianapolis, IN 46219****Plt ID: M 097-18185-00513****Reviewer: Alic Bent/EVP****Date: 2-Oct-03**Heat Input Capacity
MMBtu/hrPotential Throughput
MMCF/yr

2.5

21.9

Pollutant

	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.0	0.1	0.0	1.1	0.1	0.9

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 2 for HAPs emissions calculations.

Appendix A: Emissions Calculations**Natural Gas Combustion Only****MM BTU/HR <100****Curing Oven****HAPs Emissions****Company Name: Industrial Coating Services, Inc.****Address City IN Zip: 5345 E. Lexington Avenue, Indianapolis, IN 46219****Plt ID: M 097-18185-00513****Reviewer: Alic Bent/EVP****Date: 2-Oct-03****HAPs - Organics**

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	2.300E-05	1.314E-05	8.213E-04	1.971E-02	3.723E-05

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	5.475E-06	1.205E-05	1.533E-05	4.161E-06	2.300E-05

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations

Page 6 of 6 TSD App A

VOC Calculations

Curing Oven

Company Name: Industrial Coating Services, Inc.

Address City IN Zip: 5345 E. Lexington Avenue, Indianapolis, IN 46219

Plt ID: M 097-18185-00513

Reviewer: Alic Bent/EVP

Date: 7-Oct-03

Electro-Deposition Curing Oven

Gallons of paint used per hour = 9.519 gals/hr
Paint Density = 10.04 lbs/gals
VOC content (from MSDS) = 3.4 % by weight
25% VOC volatized during cure (from source)
Potential VOC Emissions = **3.55809939 tons/yr**

Methodology:

Potential VOC Emissions = (gals of paint used)(gals/hr) * (density)(lbs/gals) * (VOC content)(% by wt.) * (% VOC volatized)